

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GRAPHICS PROPERTIES HOLDINGS, INC., Plaintiff, v. ASUS COMPUTER INTERNATIONAL, INC., Defendants.	Civil Action No. 12-cv-210-LPS Jury Trial Demanded
GRAPHICS PROPERTIES HOLDINGS, INC., Plaintiff, v. VIZIO, INC., Defendant.	Civil Action No. 12-cv-214-LPS Jury Trial Demanded
GRAPHICS PROPERTIES HOLDINGS, INC., Plaintiff, v. GOOGLE INC. Defendant.	Civil Action No. 12-cv-1394-LPS Jury Trial Demanded
GRAPHICS PROPERTIES HOLDINGS, INC., Plaintiff, v. HEWLETT-PACKARD COMPANY, Defendant.	Civil Action No. 12-cv-1395-LPS Jury Trial Demanded

GRAPHICS PROPERTIES HOLDINGS, INC.,

Plaintiff,

v.

LENOVO GROUP LTD., LENOVO HOLDING
COMPANY, INC., and LENOVO (UNITED
STATES) INC.,

Defendant.

Civil Action No. 12-cv-1397-LPS

Jury Trial Demanded

GRAPHICS PROPERTIES HOLDINGS, INC.,

Plaintiff,

v.

ASUS COMPUTER INTERNATIONAL, INC.,

Defendant.

Civil Action No. 13-cv-864-LPS

Jury Trial Demanded

**DECLARATION OF VICTORIA Q. SMITH IN SUPPORT OF
DEFENDANTS' RESPONSIVE CLAIM CONSTRUCTION BRIEF**

I, Victoria Smith, declare as follows:

1. I am an attorney at the law firm of Perkins Coie LLP, counsel for defendant Google Inc. I am a member in good standing of the California Bar. I make this this declaration of my own personal knowledge and, if called as a witness, could and would testify competently thereto.
2. Attached as Exhibit 23 is a true and correct copy of Public Exhibit 34 to the Amended Complaint in ITC Investigation No. 337-TA-836.
3. Attached as Exhibit 24 is a true and correct copy of specifications for Apple Inc.'s iPad2, which is available at <https://www.apple.com/ipad-2/specs/> (last visited March 7, 2014).
4. Attached as Exhibit 25 is a true and correct copy of an Appeal Brief dated June 3, 2004 from the file history of Patent Application Serial No. 09/120,983, which issued as U.S. Patent No. 6,816,145 .
5. Attached as Exhibit 26 is a true and correct copy of Order No. 53: Initial Determination Granting Motion for Summary Determination On the Basis that Claim 1 of the '881 Patent is Indefinite issued in ITC Investigation No. 337-TA-884 on February 27, 2014.
6. Attached as Exhibit 27 is a true and correct copy of excerpts from the Expert Report of Dr. William Mangione-Smith on Claim Construction for US Patent No. 5,717,881, submitted in ITC Inv. No. 337-TA-884.
7. Attached as Exhibit 28 is a true and correct copy of excerpts from the Rebuttal Expert Report of Dr. William Mangione-Smith Regarding Claim Construction of U.S. Patent No. 5,717,881, submitted in ITC Inv. No. 337-TA-884.

8. Attached as Exhibit 29 is a true and correct copy of Order No. 52: Construing the Terms of the Asserted Claims of the '158 and '327 Patents, issued in ITC Investigation No. 337-TA-884 on February 27, 2014.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 7, 2014, in Palo Alto, California.

A handwritten signature in black ink, appearing to read "Victoria Q. Smith", written in a cursive style.

Victoria Smith